

**UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF NEW YORK**

LEO MAY,	)	
	)	
Plaintiff	)	<b>Case No.: 1:14-cv-00226</b>
	)	
v.	)	<b>DECLARATION OF</b>
	)	<b>TARA L. PATTERSON</b>
VIRTUOSO SOURCING GROUP, INC.,	)	
	)	
Defendant	)	
_____	)	

I, Tara L. Patterson, certify the following to be true and correct:

1. I personally handled certain aspects of this matter. This Certification is submitted in support of Plaintiff's Motion for Default Judgment.

**I. QUALIFICATIONS OF COUNSEL**

2. I am a senior associate at Kimmel & Silverman, P.C. in Ambler, Pennsylvania, and supervise an associate and paralegal.

3. My practice entails consumer credit law and employment law matters.

4. I have litigated countless cases arising under consumer protection statutes, including the FDCPA.

**A. BAR ADMISSIONS**

4. I have been licensed to practice law in the Commonwealth of Pennsylvania since December 2001.

5. I am also admitted to practice before the United States District Courts for the Eastern, Middle and Western Districts of Pennsylvania; the United States District Court for the Eastern and Western Districts of Arkansas; the United States District Court Colorado; the United States District Court of North Dakota; the United States District Court of the Eastern District of

Wisconsin; the United States District Court for the Northern District of Illinois; and the United States District Courts for the Eastern, Western and Northern Districts of Oklahoma.

**B. EXPERIENCE**

6. Prior to joining Kimmel & Silverman P.C. in November 2009, I was an attorney for the Governor's Office of General Counsel assigned to the Pennsylvania State Police as an Assistant Counsel from June 2004 to November 2009.

7. In this capacity, I prosecuted violations of the Liquor Code and related regulations; represented the Department in arbitrations for various disciplinary and contractual matters; advised the Megan's Law Section and DNA Laboratory on legal issues; defended the Department in matters before the Pennsylvania Human Relations Commission and Equal Employment Opportunity Commission; litigated Heart & Lung Act benefit cases; prosecuted municipal police officers at decertification hearings; assisted with drafting state legislation and regulations; developed training for and instructed State Troopers and Municipal Police Officers; drafted legal opinions on various issues of importance for the Department; and handled various other matters.

8. Prior to serving as Assistant Counsel at the Pennsylvania State Police, I was an attorney for the Governor's Office of General Counsel assigned to the Pennsylvania Board of Probation and Parole as an Assistant Counsel from September 2001 to June 2004.

9. In this capacity, I represented the Board in original jurisdiction and appellate matters before the Pennsylvania Commonwealth, Superior and Supreme Courts; advised the State Sexual Offenders' Assessment Board; litigated matters before the State Civil Service Commission; advised the Board, hearing examiners and parole agents on various legal matters; advised the Board's EEO Officer on investigations; and trained parole agents on various topics, including prosecuting parole violators, handling objections, and evidentiary issues.

**C. EDUCATION**

10. I earned a Bachelor of Arts in Political Science and History from Elizabethtown College in May of 1998.

11. I received a Juris Doctorate from Widener University School of Law in Harrisburg, Pennsylvania, in May of 2001.

12. While at Widener University School of Law, I was a member of the Trial Advocacy Honor Society.

**II. MARKET RATE**

13. My hourly billable rate is \$300.00. However, for this matter I have voluntarily reduced my rate to \$200.00. That is a fair, reasonable, market rate for an attorney of similar credentials and experience in consumer credit matters in this District.

**III. HOURS SPENT**

14. I spent a total of 0.8 hours on this matter. A detailed breakdown of my time is set forth in the billing records attached to the Motion as Exhibit A.

15. The time spent on this matter was both reasonable and necessary, in my professional opinion. I believe my experience in consumer credit and fair debt litigation, as well as in general litigation, enabled me to be efficient with my time in this matter.

Pursuant to 28 U.S.C. § 1746, I certify, under penalty of perjury that the foregoing is true and correct.

DATED: October 17, 2014

BY: /s/ Tara L. Patterson  
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